



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII, MONTANA OFFICE  
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096  
HELENA, MONTANA 59626-0096

EC 2  
970377

Ref: 8MO

October 28, 1997

Ms. Gloria E. Flora, Supervisor  
Lewis & Clark National Forest  
1101 15 Street North  
P.O. Box 869  
Great Falls, MT 59403

Re: Lewis & Clark NF Oil and Gas  
Leasing Final EIS

Dear Ms. Flora:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency, Region VIII, Montana Office (EPA) reviewed the above-referenced Final Environmental Impact Statement (FEIS).

We are pleased that the Forest Service has decided not to offer for lease available lands in the Rocky Mountain Division of the Lewis & Clark National Forest. This no lease decision will avoid adverse oil and gas exploration/development impacts to ecosystem processes and functions in the relatively large, undisturbed and unique area comprising the Rocky Mountain Front, for the next 10-15 years.

We do not object to offering for lease available lands on the Jefferson Division with the stipulations described in Alternative 7 of the FEIS. We do have several concerns, however, regarding the response to our comments on the DEIS.

While we are very pleased with the Forest Service's decision not to offer leases on the Rocky Mountain Division of the Forest at this time, we are concerned about the response to our DEIS comments that indicated the Forest has not attempted to map and apply rankings to resource values outside the National Forest boundary (comment 5, page IX-26). We are concerned about this in regard to lands potentially leased on the Jefferson Division, and in regard to any decisions that could potentially offer lands on the Rocky Mountain Division for leasing in the future.

We believe that an adequate cumulative impacts analysis must cover the extent of the impact area, regardless of the ownership of the impact area. The incremental impact of drilling adjacent to the Forest should be assessed and added to impacts of drilling



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within the forest to adequately analyze and disclose cumulative impacts. The CEQ NEPA regulations (40 CFR 1508.7) indicate that incremental impacts of the action (i.e., proposed oil and gas leasing and development) when added to other past, present and reasonably foreseeable future actions, including actions which take place on non-Federal land adjacent to the Forest, regardless of who undertakes such actions, should be fully disclosed.

Also, the measures that are or may be available to mitigate adverse effects of leasing must cover the full range of impacts of the proposed oil and gas exploration and development activity, even if those impacts are located off national forest land (see question 19 of 40 Most Asked Questions Concerning CEQ's NEPA Regulations).


The EPA also remains concerned that the proposed CSU stipulation for Landtypes 200, 201, 11 and 11A may not provide adequate protection to wetlands. We can not ascertain if Landtypes 200, 201, 11, and 11A adequately cover all wetlands (wetlands require presence of wetland hydrology, hydric soils, and hydrophytic vegetation). The EPA recommends that the Forest Service develop a process to assure that wetlands are identified and delineated at the drilling application stage so that activities proposed in wetlands could be moved. The U.S. Army Corps of Engineers Manual for Identifying and Delineating Jurisdictional Wetlands should be used at the drilling application stage to assure that wetlands in areas of proposed disturbance are identified and flagged for avoidance. We are also concerned that the 40 acre minimum mapping scale used for leasing analyses may miss small wetland areas.

We continue to recommend that air and water quality monitoring plans be prepared, identified, and implemented at the lease proposal stage, to verify site conditions, and validate predictions and the adequacy of the NEPA analysis and site-specific stipulations.

The EPA is also concerned with some of the responses to our DEIS comments regarding air quality impacts. We are enclosing comments from our air quality specialist in our Denver Regional Office.

The EPA appreciates the opportunity to review and comment on the DEIS. If we may provide further explanation of our concerns please contact Mr. Steve Potts of my staff in Helena at (406) 441-1140 ext. 232.

Sincerely,

  
John F. Wardell  
Director  
Montana Office



cc: Cindy Cody/Mike Strieby, 8EPR-EP, EPA Denver  
Leslie Vaculic, USFS R-1 LM, Missoula  
Larry Hamilton, BLM, Billings

## EPA Air Quality Comments on the Lewis and Clark National Forest Oil and Gas Leasing FEIS

1. Comment #2, Page IX-25. For a cumulative effect, EPA assumes that if oil/gas is found in the leased areas, then more wells than those listed in Table IV-3 would be drilled. Cumulative effects includes "reasonably foreseeable future" development. A reasonable assumption may be that a half or one-third of the exploratory wells will find producible quantities of a resource, and for each of these wells, ten additional wells would be drilled. The oil/gas industry can possibly give better statistics as to what is likely to occur. The cumulative impacts from this development needs to be addressed in the EIS so that the decision-maker can weigh all of the alternatives.
2. Comment #12, Page IX-27. EPA understands that a Level 2 analysis using the VISCREEN model was used. The last two sentences of the comment are confusing in that "model indicated the "plume" color would be barely perceptible" and the next sentence states "low contrast criteria ... indicate that the actual plume would not be perceptible." Apparently, the contrast criteria for Delta E (2.0) would be exceeded inside and outside the wilderness area. Are these impacts related only to drilling/development activities?

What are the visibility impacts related to operational activities especially (from last sentence of first paragraph on page IV-28), "If all of the analysis wells were to go into production simultaneously, more gas processing plants may be needed which could require additional air quality permits."

In addition, there are many references to the air permitting requirements of the State of Montana. NEPA is not a permitting document. NEPA is a public disclosure document which incorporates cumulative effects analyses (not required in permitting). Stating that a source will require a state operating permit does not excuse the preparer of the NEPA document from disclosing significant impacts.

3. Comment #13, Page IX-27. EPA appreciates the suggested revisions that have been incorporated into the EIS. EPA also understands that oil/gas companies will not drill a 10,000 foot well unless there is a fairly good chance of having a producing well. Therefore, the impacts from a developed gas/oil field should be presented in the EIS.

The second sentence in the second paragraph of comment #13 states, "Field development effects would be in addition to the effects of drilling but would generally not be cumulative since field development would occur after test

well sites were drilled." This sentence implies that all of the exploratory wells are drilled prior to allowing producing wells to operate. Delaying production until all testing wells are drilled is not realistic. Cumulative impact analysis should include a scenario where some wells are actually operating while other wells (nearby) are being drilled.

From the first sentence of the third paragraph for comment #13, "The air quality analysis did not specifically quantify the emissions associated with field development and production since no specific production scenarios were developed." The EIS does not appear to present air quality impacts from the operation of pumping stations or natural gas compressors. In a producing field, these units operate 24 hrs/day, 365 days/yr for many years. Air quality impacts resulting from these operations should be presented in the EIS, specifically disclosing impacts to Class 1 areas.

4. Page Summary-9, middle of the left column, Section - Air Quality. "Modeling results indicate that while none of the analysis well sites would violate air quality or visibility standards, hypothetical drilling projected in the Falls Creek area ... could require an air quality permit prior to drilling (based on modeled emissions)." As stated in the above responses to comments, whether or not a source needs an air permit is not at issue, since any impacts from this source should be disclosed in the EIS. This first sentence disagrees with the first sentence in the second paragraph on page IV-26, "If outputs ..., the Fina sites have projected NO<sub>x</sub> and SO<sub>2</sub> concentrations which would exceed the Class 1 increments at the Glacier National Park boundary."